

EB-06-TC-060
EB Docket No. 06-36

CERTIFICATION OF CPNI FILING
FEBRUARY 3, 2006

I certify that I am an officer of Shidler Telephone Company; and I have personal knowledge that Shidler Telephone Company has established operating procedures that are adequate to ensure compliance with Section 222 of the Communications Act of 1934, as amended, and the Federal Communication Commission's Customer Proprietary Network Information (CPNI) rules as set forth in Subpart U of Title 47 of the Code of Federal Regulations; 47 C.F.R §64.2001 through §64.2009.

Lisa Patton
Officer's Printed Name

Lisa Patton
Officer's Signature

Vice President
Title

February 3, 2006
Date

STATEMENT OF COMPLIANCE WITH THE FCC'S CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) RULES

Shidler Telephone Company's operating procedures ensure that Shidler Telephone Company is in compliance with the FCC's CPNI Rules because disclosure of, or permitting access to, our customers' CPNI is not allowed without obtaining the requisite customer approval, except as required by law, or the exceptions set forth in 47 U.S.C. §222, and Subpart U of Title 47 of the Code of Federal Regulations; 47 C.F.R. §64.2001 through §64.2009.

Shidler Telephone Company has internal procedures in place to educate our employees about CPNI and the disclosure of CPNI. Our employees are instructed that CPNI is information that relates to the quantity, technical configuration, type, destination, location and amount of use of the telecommunications services subscribed to by any customer of Shidler Telephone Company that is made available to us by the customer solely by virtue of our relationship with our customers; and information contained in the bills pertaining to telephone exchange service or toll service of other carriers that we bill for received by our customers; except that such term does not include subscriber list information. Our employees that have access to this information are aware of the FCC's rules and are prohibited from disclosing or permitting access to CPNI without the appropriate customer consent or as allowed by law and the FCC rules. Any employee that discloses CPNI is subject to disciplinary action, and possible termination. We also ensure that our vendors that lawfully have access to our customer CPNI, such as our billing company, are aware of the CPNI rules.

Other than the exceptions for use of CPNI being customer approval, as required by law, and the exceptions set forth in 47 U.S.C. §222, and Subpart U of Title 47 of the Code of Federal Regulations; 47 C.F.R. §64.2001 through §64.2009, CPNI is not used by Shidler Telephone Company without customer notification and approval.

If our customers' CPNI is used for sales and marketing campaigns, the appropriate safeguards are taken as set forth in 47 C.F.R. §64.2009.